

**REMARKS/ARGUMENTS**

In view of the amendments and remarks herein, favorable reconsideration and allowance of this application are respectfully requested. Claims 21-31 are pending for further examination.

First, Applicant would like to thank the Examiner for the courtesy of discussing the outstanding rejection and cited prior art with the undersigned attorney on March 7, 2005. During the discussion, Applicant and the Examiner discussed the scope of the DeLorme and Pinzon references as applied to the currently pending claims. Applicant advised that a response to the rejection would be filed in order to point out the differences between the combined teachings of the cited references, including Worcester, and the claimed invention.

Claims 21-25 and 27-31 have been rejected under 35 USC 103 as being obvious over DeLorme in view of Pinzon and Worcester. For at least the following reasons, Applicant respectfully submits that the invention defined by the amended claims here is not rendered obvious by these references. Thus, reconsideration and withdrawal of this rejection are respectfully requested.

As discussed with the Examiner, DeLorme does not teach or suggest a computerized reservation/IT system that is arranged to automatically generate an electronic key upon receiving from the wireless terminal of a user a reservation or check-in request, as required by claim 21. While DeLorme does disclose a travel reservation and planning system which enables a user to make reservations at, for example, a hotel using a wireless device, there is no teaching or suggestion in DeLorme to automatically

generate an electronic key or to automatically and wirelessly communicate the electronic key to the user's wireless terminal. The Examiner has indicted that DeLorme discloses generating "electronic output" in response to receiving a reservation request and communicating the electronic output to the requesting terminal. However, it is clear that the electronic output contemplated in DeLorme is limited to reservation confirmation type information and does not in any way contemplate or suggest that the electronic output would be an electronic key.

More particularly, DeLorme does not teach or suggest that the electronic output would in any way be capable of being used to automatically actuate a remotely operable door lock associated with a hotel room assigned to the user in response to the reservation and/or check-in request, as expressly required by amended claim 21 herein. In short, with respect to hotels, DeLorme is limited to remotely making reservations and wirelessly obtaining a confirmation code for the reservation. In contrast, the invention defined by amended claim 1 herein defines a system in which an electronic key is obtained automatically and wirelessly, wherein the key is used to enable the user to automatically access an assigned hotel room without having to take any particular action, such as pressing a predefined button on the user's wireless terminal. In addition, DeLorme fails to teach or suggest a system in which a computerized hotel reservation/IT system also automatically and wirelessly communicates the electronic key to the remotely operable door lock associated with the assigned hotel room, as also required by amended claim 21 herein.

For at least the foregoing reasons, Applicant respectfully submits that the primary reference, DeLorme, is very different from the invention defined by amended claim 21, and is not at all concerned with the same problems or the same solutions, as those to which the claimed invention is directed. Moreover, the secondary references to Pinzon and Worcester fail to make up for the clear deficiencies of DeLorme.

Pinzon is directed to a door locking/unlocking system utilizing direct and network communications. While Pinzon does suggest that the system thereof could be used in connection with hotels, it fails to teach or suggest the specific combination of features set forth in amended claim 21, even if properly combinable with DeLorme. As with DeLorme, Pinzon fails to teach or suggest a computerized reservation/IT system that is arranged to automatically generate an electronic key upon receiving from the wireless terminal of a user a reservation or check-in request, as required by amended claim 21. In addition, like DeLorme, Pinzon fails to teach or suggest a system in which a computerized hotel reservation/IT system also automatically and wirelessly communicates the electronic key to the remotely operable door lock associated with the assigned hotel room, as also required by amended claim 21 herein. Furthermore, while Pinzon states that the transmitter could be such that it operates the lock when it is in range, Applicant respectfully submit that this does not render obvious the system of amended claim 21, which requires all of the specific recited features in combination and provides a hotel registration and/or check-in system which is very convenient for users and enables hotel room access without requiring the user to press any buttons on the users terminal.

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Worcester also fails to make up for the deficiencies of DeLorme and Pinzon.

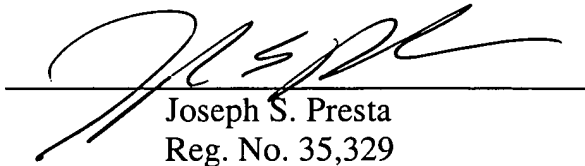
While Worcester discloses the use of an on-line system for communicating door lock information from an IT system, it still does not teach or suggest the specific combination features defined in amended claim 21, even if combined with the other cited references.

In sum, Applicant respectfully submits that the cited references fail to establish a *prima facie* case of obviousness for amended claim 21 under Section 103. Substantially the same arguments apply to amended independent claim 27 based on the similar method steps set forth therein. Thus, Applicant believes that all of the pending claims are allowable over the prior art of record. Accordingly, withdrawal of the rejections and allowance of the amended claims herein are earnestly solicited.

Should the Examiner have any questions, or deem that any formal matters need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney at the phone number below.

Respectfully submitted,

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